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State of California

Department of Public Health
Drinking Water Field Operations Branch

Memorandum

Date: August 9, 2007

To: Douglas K. Patteson, P.E.
California Regional Water Quality Control Board
Central Valley Region
1685 E. Street
Fresno, CA 93706

From: Carl L. Carlucci, P.E. 
Merced District
Southern California Branch
Drinking Water Field Operations
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Fresno, CA 93720

Subject: Tentative Waste Discharge Requirements for
Silvertip Resort Village Wastewater Treatment Facility
Mariposa County

I have reviewed the subject Tentative Waste Discharge Requirements and I have the following comments:

1. Finding No. 44 refers to Table 64431-B (Fluoride) of Section 64431, Title 22, California Code of Regulations. Please note that Table 64431-B no longer exists in Title 22.
2. Groundwater Limitation 1.a. (ii) specifies that the release of waste constituents shall not cause the groundwater to exceed a total coliform concentration of 2.2 MPN/100mL. The Department's Total Coliform Rule, which was adopted in 1991, lowered the detection level for total coliform in drinking water to 1.1 MPN/100mL. Therefore, we recommend that your Groundwater Limitation for total coliform be lowered to 1.1 MPN/100mL. In addition, the release of waste constituents should not cause the groundwater to contain any detectable level of total coliform (i.e., the total coliform concentration in the groundwater should be less than 1.1 MPN/100mL).

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3. Our Department's Water Recycling Criteria specifies that the recycled water shall be sampled at least daily for total coliform bacteria and shall be continuously monitored for turbidity using a continuous turbidity analyzer and recorder following filtration. Therefore, the monitoring and reporting program needs to be revised to reflect these requirements.
4. Our office is concerned about the location of the leachfield and spray field areas, which are upgradient and near domestic water supply wells. In particular, the Yosemite Alpine Wells Nos. 1 and 2 have shallow casings and fractures and are located in close proximity to one of the spray fields. In addition, the Site Plan Map (Attachment B) shows Silvertip Well No. 4 within a spray field area. Our office believes that the leachfield and spray field areas should be relocated to provide more separation distance and protection for the groundwater sources.

If you have any questions, please call me at (559) 447-3132 or e-mail me at Carl.Carlucci@cdph.ca.gov.

cc: Mariposa County Environmental Health Department